

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

Civil Action No.:

EDWARD RABER; NICHOLAS SUROIU and/or
SHARP TRUCKING, INC.,

Defendants.

NOTICE OF PETITION FOR REMOVAL FROM STATE COURT TO FEDERAL COURT

TO:

Sander Budanitsky, Esquire
Law Offices of Sander Budanitsky, LLC
520 West First Ave
Roselle, NJ 07203
Attorneys for Plaintiff – Igor Volkov

PLEASE TAKE NOTICE that the defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc. (hereinafter referred to collectively as “Petitioners” or “Defendants”), herein files and submits this Notice of Petition for the Removal from State Court to Federal Court in the above matter.

The Notice of Petition for Removal is also being filed with the Superior Court of New Jersey, Law Division, Middlesex County pursuant to 28 U.S.C. §1446 (d).

A Motion to Remove the case from New Jersey State Court to Federal Court will be filed after the Federal Court assigns this matter a Civil Action Number.

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE
MARC R. JONES, ESQUIRE
Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking
155 Gaither Drive – Suite B
Mount Laurel, NJ 08054
856-761-3800
mmitchell@c-wlaw.com
mjones@c-wlaw.com

DATED: April 10, 2012

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

Civil Action No.:

EDWARD RABER; NICHOLAS SUROIU and/or
SHARP TRUCKING, INC.,

Defendants.

PETITION FOR REMOVAL FROM STATE COURT TO FEDERAL COURT

Petitioners or Defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc., hereby file the within Petition for Removal to the United States District Court of New Jersey from the Superior Court of New Jersey, Law Division – Middlesex County, and hereby says:

1. On or about February 28, 2012, Plaintiff filed a Complaint against the Defendants in the Superior Court of New Jersey, Law Division – Middlesex County entitled Volkov v. Raber, et al., under docket number MID-L-1358-12. (**Exhibit “A”**, copy of the filed Complaint)
2. Defendant, Nicholas Suroiu and/or Sharp Trucking received a copy of the Complaint on or about April 3, 2012. (**Exhibit “B”**)
3. To date, no proof of service for any defendant has been filed with the Court based on a review of the State Court public access system. (**Exhibit “C”**)
4. Plaintiff is seeking damages for (2) motor vehicle accidents allegedly involving the same vehicles that occurred on January 13, 2011. (**Exhibit “D”**, copy of the police accident report)
5. The first accident occurred when Plaintiff alleged that the vehicle being driven by Mr. Raber made a wide turn and struck the front of his vehicle causing property damage. (**Exhibit “D”**)
6. The second accident occurred when Plaintiff drove in pursuit of the tractor trailer being driven by Mr. Raber and he intentionally struck the tractor trailer to “get his attention”. (**Exhibit “D”**)
7. Plaintiff, upon information and belief, is a resident of the State of New Jersey. (**Exhibit “A”**)

8. Defendant, Edward Raber, is a resident of the Commonwealth of Pennsylvania, residing at 1155 March Street, Sharon, Pennsylvania. (**Exhibit "D"**)

9. Defendant/owner of the tractor trailer, Nicholas Suroiu and/or Sharp Trucking, Inc. is a commercial trucking company that is incorporated in the State of Ohio with its principal place of business located at 3816 Wilson-Sharpsville Road, Cortland, Ohio. (**Exhibit "D"**)

10. The present case is a civil action in which the United States District Court for the District of New Jersey has original jurisdiction by virtue of diversity of citizenship of the parties pursuant to 28 U.S.C. §1332.

11. Pursuant to 28 U.S.C. §1332, this case involves injuries which, as alleged, will exceed \$75,000.00 exclusive of interest and costs, as Plaintiff has made a settlement demand of \$175,000.00. (**Exhibit "E,"** copy of Plaintiff's demand letter dated January 30, 2012)

12. Also, pursuant to 28 U.S.C. §1332 (a) (3) this case involves parties who are citizens of different states. (**Exhibit "D"**)

13. In accordance with the applicable Federal Rules of Civil Procedure and/or Federal Statutes, specifically 28 U.S.C.S. §1446 (b), this Notice for Removal has been filed within (30) days after the Petitioners/Defendants received notice of Plaintiff's Complaint. See Granovsky v. Pfizer, Inc., et al., 631 F.Supp.2d 554, 559 (D.N.J. 2009)

14. Accordingly, pursuant to 28 U.S.C. §1332, this matter is a civil action that may be removed by the Petitioner's/Defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc. from state court to the United States District Court for the District of New Jersey over which the federal court has original jurisdiction.

WHEREFORE, Petitioners/Defendants, Edward Raber; Nicholas Suroia and/or Sharp Trucking, Inc., hereby respectfully request that the aforementioned civil action commenced against them by Plaintiff, be removed to the United States District Court for the District of New Jersey for all further proceedings.

Respectfully submitted,

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE
MARC R. JONES, ESQUIRE
Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking
155 Gaither Drive – Suite B
Mount Laurel, NJ 08054
856-761-3800
mmitchell@c-wlaw.com
mjones@c-wlaw.com

DATED: April 10, 2012

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

Civil Action No.:

EDWARD RABER; NICHOLAS SUROIU and/or
SHARP TRUCKING, INC.,

Defendants.

**CERTIFICATION OF FILING AND SERVICE OF NOTICE OF PETITION FOR REMOVAL
FROM STATE COURT TO FEDERAL COURT**

The undersigned hereby certifies and confirms that the Notice of Petition for Removal from State Court to Federal Court on behalf of the defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc., was e-filed with the United States District Court of New Jersey on April 10, 2012 and that a hard copy was also sent to the Clerk of the Superior Court of New Jersey, Law Division, Middlesex County, and counsel for Plaintiffs via New Jersey Lawyers' Service at the following addresses:

Clerk – Superior Court of New Jersey
Middlesex County Court House
56 Paterson Street
P.O. Box 964 – 1st Floor
New Brunswick, NJ 08902

Sander Budanitsky, Esquire
Law Offices of Sander Budanitsky, LLC
520 West First Ave
Roselle, NJ 07203
Attorneys for Plaintiff – Igor Volkov

I am aware that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE
MARC R. JONES, ESQUIRE
Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking
155 Gaither Drive – Suite B
Mount Laurel, NJ 08054
856-761-3800
mmitchell@c-wlaw.com
mjones@c-wlaw.com

DATED: April 10, 2012

EXHIBIT “A”

LAW OFFICES OF SANDER BUDANITSKY, LLC
520 WEST FIRST AVENUE
ROSELLE, NEW JERSEY 07203
(908) 241-3445 * FAX (908) 241-4595
ATTORNEY FOR PLAINTIFF(S)

IGOR VOLKOV,

SUPERIOR COURT
MIDDLESEX COUNTY
RECEIVED & FILED

FEB 28 2012

GREGORY EDWARDS
DEPUTY CLERK
OF SUPERIOR COURT

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MIDDLESEX COUNTY

Plaintiff(s),

DOCKET NO.: L-1358-12

v.

CIVIL ACTION

EDWARD RABER, NICHOLAS SURDY
and/or SHARP TRUCKING, INC.,

Defendant(s),

COMPLAINT AND JURY DEMAND

Plaintiff, IGOR VOLKOV, residing in the City of East Brunswick, County of Middlesex and State of New Jersey, by way of complaint against the Defendants, says:

FIRST COUNT

1. On or about the 13th day of January 2011, the Plaintiff, IGOR VOLKOV, was the operator of a motor vehicle, which was traveling Brunswick Avenue near and about its intersection with Bayway in the City of Elizabeth, County of Union and State of New Jersey.

2. At the above time and place, the Defendant, EDWARD RABER, was the operator of a motor vehicle owned by the Defendant, NICHOLAS SUCOV and/or SHARP TRUCKING, INC., which was traveling near the aforesaid vicinity.

3. At all times relevant and material to this Complaint, the Defendant(s), EDWARD RABER, operated the motor vehicle owned by the Defendant, NICHOLAS SUCOV and/or SHARP TRUCKING, INC., with the permission and consent, express or implied, of said owner.

4. At all times relevant and material hereto, the Defendant, EDWARD RABER, was an employee, agent and/or servant of the Defendant, NICHOLAS SUCOV and/or SHARP TRUCKING, INC., acting within the scope of his/her employment and/or agency.

5. At the above time and place, the Defendant, EDWARD RABER, failed to keep his/her vehicle under reasonable and proper control and so carelessly, recklessly and negligently operated his/her motor vehicle, among other things, failing to make proper observations, driving at an excessive rate of speed, and being otherwise inattentive, so as to cause his/her motor vehicle to violently collide with the Plaintiff's vehicle.

6. This accident resulted solely from the negligence and carelessness of the Defendant(s) herein and was due in no part on any act, or failure to act, on the part of the Plaintiff(s).

7. As a direct and proximate result of the foregoing, the Plaintiff, IGOR VOLKOV, was caused to sustain serious, painful and permanent injuries, has experienced great pain and suffering, has suffered great shock and mental anguish, will in the future

experience great pain and suffering, was caused to incur great expenses for medical care and attention, will in the future incur additional expenses, was caused to lose large sums of money for wages he would have earned but for his injuries and will in the future lose large sums of money for wages, and has in the past, and will in the future, lose his right to the full enjoyment of life.

WHEREFORE, the Plaintiff, IGOR VOLKOV, hereby demands judgment against the Defendants, EDWARD RABER, NICHOLAS SUROV and/or SHARP TRUCKING, INC., both jointly and severally, together with interest and cost of suit.

DATED: February 22, 2012


Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)

JURY DEMAND

Plaintiff demands a trial by jury as to all Counts of the within Complaint.

DATED: February 22, 2012


Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, it is stated that the matter in controversy is not the subject to any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge or belief. Also, to the best of our belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

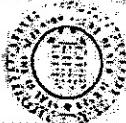
DATED: February 22, 2012


Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		
	<p>Use for Initial Law Division</p> <p>Civil Part pleadings (not motions) under Rule 4:6-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		
ATTORNEY / PROSE NAME Sander Budanitsky, Esq.		TELEPHONE NUMBER (908) 241-3445	FOR USE BY CLERKS OFFICE ONLY PAYMENT: <input type="checkbox"/> CASH <input checked="" type="checkbox"/> CHECK/CREDIT CARD <input type="checkbox"/> MASTERCARD CHG/CX K# <input type="checkbox"/> MIDDLESEX COUNTY RECEIVED & FILED AMOUNT: <input type="checkbox"/> \$0.00 PERIOD: <input type="checkbox"/> APR 21 2010 OVERPAYMENT: <input type="checkbox"/> BATCH #: MURPHY EDWARDS DEPUTY CLERK: <input type="checkbox"/>
FIRM NAME (if applicable) Law Offices of Sander Budanitsky, LLC		COUNTY OF VENUE Middlesex	
OFFICE ADDRESS 520 West First Avenue Roselle, NJ 07203		DOCKET NUMBER (when available) <input type="checkbox"/> Complaint	
JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
NAME OF PARTY (e.g., John Doe, Plaintiff) Igor Volkov, plaintiff		CAPTION Igor Volkov vs. Sharp Trucking, Inc., et al	
CASE TYPE NUMBER (See reverse side for listing) 600N		IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. IF YES, LIST DOCKET NUMBERS	
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) MAXUM <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILY <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION Plaintiff was injured as a result of a MVA.			
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE? Russian	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:36-7(b).			
ATTORNEY SIGNATURE 			

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condominium, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 899 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 598 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WANTS

Centrally Managed Litigation (Track IV)

- | | |
|---|--|
| <ul style="list-style-type: none"> 280 ZELNORM 285 STRYKER TRIDENT HIP IMPLANTS 288 PRUDENTIAL TORT LITIGATION 289 REGLAN | <ul style="list-style-type: none"> 290 POMPTON LAKES ENVIRONMENTAL LITIGATION 291 PELVIC MESH/GYNECARE 292 PELVIC MESH/BARD 293 DEPUY ASR HIP IMPLANT LITIGATION |
|---|--|

Mass Tort (Track IV)

- | | |
|--|--|
| <ul style="list-style-type: none"> 248 CIBA GEIGY 266 HORMONE REPLACEMENT THERAPY (HRT) 271 ACCUTANE/ISOTRETINOIN 274 RISPERDAL/SEROQUEL/ZYPREXA 278 ZOMETA/VARELIA 279 GADOLINIUM | <ul style="list-style-type: none"> 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 282 FOSAMAX 284 NUVARING 286 LEVAQUIN 287 YAZ/YASMIN/CELLESTE 601 ASBESTOS |
|--|--|

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1.
In the space under "Case Characteristics".

Please check off each applicable category Putative Class Action Title 59

Law Offices of Sander Budanitsky, LLC.

520 West First Avenue
Roselle, New Jersey 07203

Sander Budanitsky*

Kimberly A. Rudolph*
Of Counsel

Tel: (908) 241-3445

Fax: (908) 241-4595

* Also admitted in Pennsylvania

www.sbnjlaw.com

March 19, 2012

VIA REGULAR & CERTIFIED MAIL, RRR

SHARP TRUCKING, INC.
3861 Wilson Sharpsville Road
Cortland, OH 44410

RE: Igor Volkov vs. Edward Raber, et al
Docket No.: MID-L-1358-12

Dear Sir/Madam:

Please be advised that our office has been retained to represent the interest of Igor Volkov with regard to the above referenced matter.

Enclosed please find a Summons and Complaint which is being served upon you pursuant to Rule 4:4-4 of the Rules of the Court Governing the State of New Jersey. Please be further advised that you have thirty five (35) days to file an Answer. If you do not file an Answer within (35) days, Default will be entered against you.

Upon receipt of this Summons & Complaint kindly forward a copy or same to your Insurance Carrier at the time of the loss.

Thank you for your time and attention.

Very truly yours,

/s/ Sander Budanitsky

Sander Budanitsky

SP/cc

w/encl.

LAW OFFICES OF SANDER BUDANITSKY, LLC
520 WEST FIRST AVENUE
ROSELLE, NEW JERSEY 07203
(908) 241-3445 * FAX (908) 241-4595
ATTORNEY FOR PLAINTIFF

IGOR VOLKOV,

SUPERIOR COURT OF NEW JERSEY
MIDDLESEX COUNTY - LAW DIVISION

Plaintiff(s),

DOCKET NO.: MID-L-1358-12

VS.

EDWARD RABER, NICHOLAS Surov
and SHARP TRUCKING, INC.,

CIVIL ACTION

SUMMONS

Defendant(s),

From the State of New Jersey, To the Defendant Named Above: SHARP TRUCKING, INC.

The Plaintiff named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court of New Jersey in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) An \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to the Plaintiff's attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will no protect your rights; you must file a written Answer or Motion if you want the court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days from the date of service, the court may enter Default or Default Judgement against you for the relief that the Plaintiff demands, together with interests and costs of suit. If Judgement is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the Judgement.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of the numbers is also provided.

Dated: March 19, 2012

JENNIFER PEREZ
Clerk of the Superior Court

Name of Defendants to be served: SHARP TRUCKING, INC.

Address of Defendants to be served: 3861 Wilson Sharpsville Road
Cortland, OH 44410

ATLANTIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Blvd., First Fl. Atlantic City, NJ 08401 LAWYER REFERRAL: (609) 345-3444 LEGAL SERVICES: (609) 348-4200	CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeton, NJ 08302 LAWYER REFERRAL: (856) 692-6207 LEGAL SERVICES: (856) 451-0003	MERCER COUNTY: Deputy Clerk of the Superior Court 175 S. Broad Street P. O. Box 8068 Trenton, NJ 08650 LAWYER REFERRAL: (609) 585-6200 LEGAL SERVICES: (609) 695-6249	SALEM COUNTY: Deputy Clerk of the Superior Court 92 Market St., P. O. Box 18 Salem, NJ 08079 LAWYER REFERRAL: (856) 678-8363 LEGAL SERVICES: (856) 451-0003
BERGEN COUNTY: Deputy Clerk of the Superior Court Case Processing Section, Rm 119 Justice Center, 10 Main St. Hackensack, NJ 07601-7698 LAWYER REFERRAL: (201) 488-0044 LEGAL SERVICES: (201) 487-2166	ESSEX COUNTY: Deputy Clerk of the Superior Court 30 West Market Street Room 131 Newark, NJ 07102 LAWYER REFERRAL: (973) 622-6207 LEGAL SERVICES: (973) 624-4500	MIDDLESEX COUNTY: Deputy Clerk of the Superior Court Administration Building Third Floor 1 Kennedy Sq., P. O. Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL: (732) 828-0053 LEGAL SERVICES: (732) 249-7600	SOMERSET COUNTY: Deputy Clerk of the Superior Court Civil Division Office New Court House, 3rd Fl. P. O. Box 3000 Somerville, NJ 08876 LAWYER REFERRAL: (908) 685-2323 LEGAL SERVICES: (908) 231-0840
BURLINGTON COUNTY: Deputy Clerk of the Superior Court First Fl., Courts Facility 49 Rancocas Rd. Mt. Holly, NJ 08060 LAWYER REFERRAL: (609) 261-4862 LEGAL SERVICES: (609) 261-1088	GLOUCESTER COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Altis Intake First Fl., Court House 1 North Broad Street P. O. Box 129 Woodbury, NJ 08096 LAWYER REFERRAL: (856) 848-4589 LEGAL SERVICES: (856) 848-4560	MONMOUTH COUNTY: Deputy Clerk of the Superior Court 71 Monument Park P. O. Box 1269 Freehold, NJ 07728-1269 LAWYER REFERRAL: (732) 431-5544 LEGAL SERVICES: (732) 866-0020	SUSSEX COUNTY: Deputy Clerk of the Superior Court 71 Monument Park P. O. Box 1269 Freehold, NJ 07728-1269 LAWYER REFERRAL: (732) 267-5882 LEGAL SERVICES: (973) 383-7400
CAMDEN COUNTY: Deputy Clerk of the Superior Court 1st Fl., Hall of Records 101 S. Fifth St. Camden, NJ 08103 LAWYER REFERRAL: (609) 964-4520 LEGAL SERVICES: (609) 964-2010	HUDSON COUNTY: Deputy Clerk of the Superior Court Superior Court Civil Records Dept. Brennan Court House, 1st Fl. 583 Newark Ave. Jersey City, NJ 07306 LAWYER REFERRAL: (201) 798-2727 LEGAL SERVICES: (201) 792-6363	MORRIS COUNTY: Deputy Clerk of the Superior Court Civil Division 30 Schuyler Pl., P. O. Box 910 Morristown, NJ 07960-0910 LAWYER REFERRAL: (973) 267-5882 LEGAL SERVICES: (973) 285-0911	UNION COUNTY: Deputy Clerk of the Superior Court 1st Fl., Court House 2 Broad Street Elizabeth, NJ 07207 LAWYER REFERRAL: (908) 353-4715 LEGAL SERVICES: (908) 354-4340
CAPE MAY COUNTY: Deputy Clerk of the Superior Court 9 N. Main Street Box DN-209 Cape May Court House, NJ 08210 LAWYER REFERRAL: (609) 463-0313 LEGAL SERVICES: (609) 465-3001	HUNTERDON COUNTY: Deputy Clerk of the Superior Court Civil Division 65 Park Street Flemington, NJ 08822 LAWYER REFERRAL: (609) 735-2611 LEGAL SERVICES: (609) 782-7979	OCEAN COUNTY: Deputy Clerk of the Superior Court Court House, Room 119 118 Washington Street Toms River, NJ 08754 LAWYER REFERRAL: (732) 240-3666 LEGAL SERVICES: (732) 341-2727	WARREN COUNTY: Deputy Clerk of the Superior Court Civil Division Office Court House 413 Second Street Belvidere, NJ 07823-1500 LAWYER REFERRAL: (973) 267-5882 LEGAL SERVICES: (973) 475-2010
PASSAIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Court House 77 Hamilton St. Paterson, NJ 07505 LAWYER REFERRAL: (973) 278-9223 LEGAL SERVICES: (973) 345-7171			

MIDDLESEX VENUE/CIVIL DIVISION
P.O. BOX 2633
50 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

COURT TELEPHONE NO. (732) 519-3728
COURT HOURS

TRACK ASSIGNMENT NOTICE

DATE: FEBRUARY 29, 2012
RE: VOLKOV IGOR VS SADER EDWARD
DOCKET: MID-L-001358-12

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: RON RICHARD F. BISCHNER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 062
AT: (732) 519-3737 EXT 3737.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.1:5A-2.

ATTENTION:

ATT: SANDER BUDANITSKY
BUDANITSKY LAW OFFICE SANDER
520 WEST FIRST AVE
ROSELLE NJ 07203-1028

JUDGET

EXHIBIT “B”

Marc R. Jones

From: Beth Vickers [mailto:bvickers@loveinsurance.com]

Sent: Tuesday, April 03, 2012 4:22 PM

To: Sforzo, Rick

Subject: Sharp Trucking Claim #TRK6297-04-03

Lawsuit papers attached.

Thank you,

Beth Vickers

Love Insurance Agency

34920 Ridge Rd, Suite 100

Willoughby, OH 44094

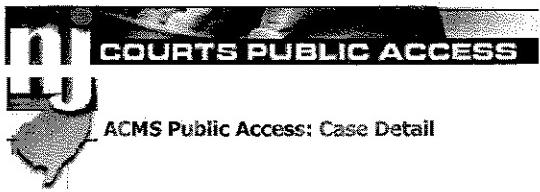
Phone: 440-975-0309

Toll Free: 877-859-3073

Direct Fax #: 440-527-5005

bvickers@loveinsurance.com

EXHIBIT “C”



ACMS Public Access: Case Detail

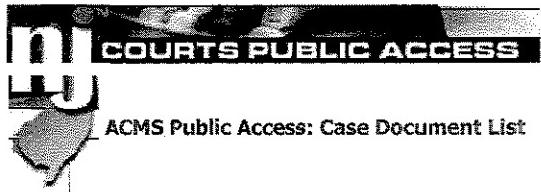


VENUE: MIDDLESEX COURT: LAW CVL DOCKET #: L 001358 12
CASE TITLE : VOLKOV IGOR VS RABER EDWARD

CASE FILED DATE	:	02 28 2012	CASE TYPE	:	603 AUTO NEG T
CASE STATUS	:	ACTIVE	CASE INITIATION TYPE	:	C COMPLAINT
DISPOSITION TYPE	:		DATE DISPOSED	:	00 00 0000
DISCOVERY DATE	:		ARGUMENT REQST DATE	:	00 00 0000
CASE PARTY COUNT	:	004	JUDGMENT ENTERED	:	NO
FIRST ANSWER DATE	:		ACTUAL SERVICE DATE	:	
EXPECTD SERVICE DATE:			CONSOLIDATION STATUS:		
CONSOLIDATION TYPE	:		DATE TRANSFERRED OUT:		
TRANSFER FROM VENUE	:	TO	LAST PROCEEDING DATE:		
LAST PROCEEDING TYPE:					
PENDING ACTION	:	PG SERVICE	PENDING ACTION DATE	:	03 09 2012
UNDISTRIBUTED AMOUNT:		0.00	DEMAND AMOUNT	:	0.00
DF ATTORNEY/PRO SE	:	NO DF HAS AN ATT	DENOVO INDICATOR	:	NO

CMP DISPUTE RESOLUTN:	AUTO ARBITRATION	TITLE 59 INDICATOR	:	NO	
JURY REQUEST	:	6 JURORS	CASE IMPOUNDED	:	NO
DATE ENTERED	:	02 29 2012			

Screen ID:CVM1019 Copyrighted © 2008 - New Jersey Judiciary
BUILD 2011.1.0.0.12



ACMS Public Access: Case Document List



Page: 1

END OF LIST

VENUE : MIDDLESEX	COURT : LAW CVL	DOCKET #: L 001358 12					
CASE TITLE : VOLKOV IGOR VS RABER EDWARD							
SEL	DATE FILED	DOC NUM	DOCUMENT TYPE	NON CONF	FILING/TARGET PARTY NAME	ATTORNEY NAME	MUL DOC PTY STA
<input type="radio"/>	02 28 2012	001	COMP	JRY	DEMAND	VOLKOV	BUDANITSKY L N

Screen ID:CVM1023 Copyrighted © 2008 - New Jersey Judiciary
BUILD 2011.1.0.0.12

EXHIBIT “D”

Page 1 of 1		<input type="checkbox"/> Fatal	New Jersey Police Crash Investigation Report										<input checked="" type="checkbox"/> Reportable	<input type="checkbox"/> Non-Reportable	<input type="checkbox"/> Change Report			
31	11-2886	10 Crash Occurred On:	BROWNSWICH AVE										11 Speed Limit:				11a) 29	
01	February 01	At Intersection With:											12 Route No.:	SUMX	13 Miles per:	14) 29		
07	Police Dept.	N	E	15) 29	16) 29	17) 29	18) 29	19) 29	20) 29	21) 29	22) 29	23) 29	24) 29	25) 29				
03	3 Day of Week:	6) Time:	7) Municipality:	8) Total Killed:	9) Total Injured:	10) 29	11) 29	12) 29	13) 29	14) 29	15) 29	16) 29	17) 29	18) 29				
02	10) 01/13/11 8:30 AM Tu W	11) 2400 hrs	12) 2008	13) 0	14) 0	15) 29	16) 29	17) 29	18) 29	19) 29	20) 29	21) 29	22) 29	23) 29				
01	25) Van No.:	26) Policy No.:	27) 022-3135-622-303	28) 162	29) 2	30) Van No. & Policy No.:	31) TBK6006297-04	32) Ins Code:	33) 120	34) 01	35) 121	36) 01	37) 121	38) 01	39) 121			
02	30) Parked	31) Ped.	32) Pedestrian	33) Resp to Emergency	34) Hit & Run	35) Parked	36) Ped.	37) Pedestrian	38) Resp to Emergency	39) Hit & Run	40) 120	41) 01	42) 121	43) 01	44) 121			
01	45) Driver's First Name:	Initial:	Last Name:	46) DOB:	47) Sex:	48) Driver's First Name:	Initial:	Last Name:	49) DOB:	50) Sex:	51) 120	52) 01	53) 121	54) 01	55) 121			
01	56) Number and Street:	57) 105 Donald St	58) 010	59) City:	60) SHARON PA 16174	61) 120	62) 01	63) DOB:	64) Expire:	65) 120	66) 01	67) 121	68) 01	69) 121	70) 01			
02	60) State:	71) NJ	72) 1621635800009614930619713	73) PA	74) 26-521-843	75) 10032401100	76) 01	77) DOB:	78) Expire:	79) 01	80) 01	81) 120	82) 01	83) 121	84) 01			
02	85) Owner's First Name:	Initial:	Last Name:	86) DOB:	87) Sex:	88) Owner's First Name:	Initial:	Last Name:	89) DOB:	90) Sex:	91) 120	92) 01	93) 121	94) 01	95) 121	96) 01		
02	97) Driver's Name:	Initial:	Last Name:	98) DOB:	99) Sex:	100) 120	101) 01	102) 121	103) 01	104) 120	105) 01	106) 121	107) 01	108) 121	109) 01			
02	103) Number and Street:	104) City:	105) State:	106) DOB:	107) Sex:	108) DOB:	109) Sex:	110) DOB:	111) Sex:	112) DOB:	113) Sex:	114) DOB:	115) Sex:	116) DOB:	117) Sex:			
02	118) Driver's Name:	Initial:	Last Name:	119) DOB:	120) Sex:	121) DOB:	122) Sex:	123) DOB:	124) Sex:	125) DOB:	126) Sex:	127) DOB:	128) Sex:	129) DOB:	130) Sex:			
02	131) Vehicle Removed To:	132) Driver:	133) Adult Escaped:	134) Towed:	135) Impounded:	136) Disabled:	137) Authority:	138) Driver:	139) Police:	140) 120	141) 01	142) 121	143) 01	144) 121	145) 01			
02	146) Vehicle Removed To:	147) Driver:	148) Adult Escaped:	149) Towed:	150) Impounded:	151) Disabled:	152) Authority:	153) Driver:	154) Police:	155) 120	156) 01	157) 121	158) 01	159) 121	160) 01			
02	161) Alcohol/Drug Test Given:	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Refused	162) Crash Diagram (NOT TO SCALE)	163) Alcohol/Drug Test Given:	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Refused	164) Crash Diagram (NOT TO SCALE)	165) Alcohol/Drug Test Given:	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> Refused	166) Crash Diagram (NOT TO SCALE)			
02	167) Type:	<input type="checkbox"/> Breath	<input type="checkbox"/> Blood	<input type="checkbox"/> Urine	168) Results:	169) %	170) Pending	171) Type:	<input type="checkbox"/> Breath	<input type="checkbox"/> Blood	<input type="checkbox"/> Urine	172) Results:	173) %	174) Pending	175) Type:	<input type="checkbox"/> Breath	<input type="checkbox"/> Blood	<input type="checkbox"/> Urine
02	176) Hazardous Material On Board:	177) Name or Picard No.:	178) Carrier No.:	179) US DOT:	180) Other:	181) Carrier No.:	182) US DOT:	183) Other:	184) Carrier No.:	185) US DOT:	186) Other:	187) Carrier No.:	188) US DOT:	189) Other:	190) Carrier No.:	191) US DOT:	192) Other:	
02	193) Commercial Vehicle Weight:	194) <input type="checkbox"/> ≤ 10,000 lbs	195) <input type="checkbox"/> 10,001 - 26,000 lbs	196) <input type="checkbox"/> ≥ 26,001 lbs	197) <input type="checkbox"/> ≤ 10,000 lbs	198) <input type="checkbox"/> 10,001 - 26,000 lbs	199) <input type="checkbox"/> ≥ 26,001 lbs	200) <input type="checkbox"/> ≤ 10,000 lbs	201) <input type="checkbox"/> 10,001 - 26,000 lbs	202) <input type="checkbox"/> ≥ 26,001 lbs	203) <input type="checkbox"/> ≤ 10,000 lbs	204) <input type="checkbox"/> 10,001 - 26,000 lbs	205) <input type="checkbox"/> ≥ 26,001 lbs	206) <input type="checkbox"/> ≤ 10,000 lbs	207) <input type="checkbox"/> 10,001 - 26,000 lbs	208) <input type="checkbox"/> ≥ 26,001 lbs		
02	209) Driver's Name:	Initial:	Last Name:	210) Vehicle Found:	211) <input type="checkbox"/> CASH	212) <input type="checkbox"/> TURNPIKE	213) <input type="checkbox"/> EXIT	214) <input type="checkbox"/> MAXIMUS	215) <input type="checkbox"/> CASINO	216) <input type="checkbox"/> TURPINE	217) <input type="checkbox"/> EXIT	218) <input type="checkbox"/> TURNPIKE	219) <input type="checkbox"/> EXIT	220) <input type="checkbox"/> MAXIMUS	221) <input type="checkbox"/> CASINO	222) <input type="checkbox"/> TURPINE	223) <input type="checkbox"/> EXIT	
02	224) Description of Crash:	225) <input type="checkbox"/> Head-on	226) <input type="checkbox"/> Side	227) <input type="checkbox"/> Rear-end	228) <input type="checkbox"/> Head-on	229) <input type="checkbox"/> Side	230) <input type="checkbox"/> Rear-end	231) <input type="checkbox"/> Head-on	232) <input type="checkbox"/> Side	233) <input type="checkbox"/> Rear-end	234) <input type="checkbox"/> Head-on	235) <input type="checkbox"/> Side	236) <input type="checkbox"/> Rear-end	237) <input type="checkbox"/> Head-on	238) <input type="checkbox"/> Side	239) <input type="checkbox"/> Rear-end		
02	240) Driver's Name:	Initial:	Last Name:	241) DOB:	242) Sex:	243) DOB:	244) Sex:	245) DOB:	246) Sex:	247) DOB:	248) Sex:	249) DOB:	250) Sex:	251) DOB:	252) Sex:	253) DOB:	254) Sex:	
02	255) Driver's Name:	Initial:	Last Name:	256) DOB:	257) Sex:	258) DOB:	259) Sex:	260) DOB:	261) Sex:	262) DOB:	263) Sex:	264) DOB:	265) Sex:	266) DOB:	267) Sex:	268) DOB:	269) Sex:	
02	270) Driver's Name:	Initial:	Last Name:	271) DOB:	272) Sex:	273) DOB:	274) Sex:	275) DOB:	276) Sex:	277) DOB:	278) Sex:	279) DOB:	280) Sex:	281) DOB:	282) Sex:	283) DOB:	284) Sex:	
02	285) Driver's Name:	Initial:	Last Name:	286) DOB:	287) Sex:	288) DOB:	289) Sex:	290) DOB:	291) Sex:	292) DOB:	293) Sex:	294) DOB:	295) Sex:	296) DOB:	297) Sex:	298) DOB:	299) Sex:	
02	300) Driver's Name:	Initial:	Last Name:	301) DOB:	302) Sex:	303) DOB:	304) Sex:	305) DOB:	306) Sex:	307) DOB:	308) Sex:	309) DOB:	310) Sex:	311) DOB:	312) Sex:	313) DOB:	314) Sex:	
02	315) Driver's Name:	Initial:	Last Name:	316) DOB:	317) Sex:	318) DOB:	319) Sex:	320) DOB:	321) Sex:	322) DOB:	323) Sex:	324) DOB:	325) Sex:	326) DOB:	327) Sex:	328) DOB:	329) Sex:	
02	330) Driver's Name:	Initial:	Last Name:	331) DOB:	332) Sex:	333) DOB:	334) Sex:	335) DOB:	336) Sex:	337) DOB:	338) Sex:	339) DOB:	340) Sex:	341) DOB:	342) Sex:	343) DOB:	344) Sex:	
02	345) Driver's Name:	Initial:	Last Name:	346) DOB:	347) Sex:	348) DOB:	349) Sex:	350) DOB:	351) Sex:	352) DOB:	353) Sex:	354) DOB:	355) Sex:	356) DOB:	357) Sex:	358) DOB:	359) Sex:	
02	360) Driver's Name:	Initial:	Last Name:	361) DOB:	362) Sex:	363) DOB:	364) Sex:	365) DOB:	366) Sex:	367) DOB:	368) Sex:	369) DOB:	370) Sex:	371) DOB:	372) Sex:	373) DOB:	374) Sex:	
02	375) Driver's Name:	Initial:	Last Name:	376) DOB:	377) Sex:	378) DOB:	379) Sex:	380) DOB:	381) Sex:	382) DOB:	383) Sex:	384) DOB:	385) Sex:	386) DOB:	387) Sex:	388) DOB:	389) Sex:	
02	390) Driver's Name:	Initial:	Last Name:	391) DOB:	392) Sex:	393) DOB:	394) Sex:	395) DOB:	396) Sex:	397) DOB:	398) Sex:	399) DOB:	400) Sex:	401) DOB:	402) Sex:	403) DOB:	404) Sex:	
02	405) Driver's Name:	Initial:	Last Name:	406) DOB:	407) Sex:	408) DOB:	409) Sex:	410) DOB:	411) Sex:	412) DOB:	413) Sex:	414) DOB:	415) Sex:	416) DOB:	417) Sex:	418) DOB:	419) Sex:	
02	420) Driver's Name:	Initial:	Last Name:	421) DOB:	422) Sex:	423) DOB:	424) Sex:	425) DOB:	426) Sex:	427) DOB:	428) Sex:	429) DOB:	430) Sex:	431) DOB:	432) Sex:	433) DOB:	434) Sex:	
02	435) Driver's Name:	Initial:	Last Name:	436) DOB:	437) Sex:	438) DOB:	439) Sex:	440) DOB:	441) Sex:	442) DOB:	443) Sex:	444) DOB:	445) Sex:	446) DOB:	447) Sex:	448) DOB:	449) Sex:	
02	450) Driver's Name:	Initial:	Last Name:	451) DOB:	452) Sex:	453) DOB:	454) Sex:	455) DOB:	456) Sex:	457) DOB:	458) Sex:	459) DOB:	460) Sex:	461) DOB:	462) Sex:	463) DOB:	464) Sex:	
02	465) Driver's Name:	Initial:	Last Name:	466) DOB:	467) Sex:	468) DOB:	469) Sex:	470) DOB:	471) Sex:	472) DOB:	473) Sex:	474) DOB:	475) Sex:	476) DOB:	477) Sex:	478) DOB:	479) Sex:	
02	480) Driver's Name:	Initial:	Last Name:	481) DOB:	482) Sex:	483) DOB:	484) Sex:	485) DOB:	486) Sex:	487) DOB:	488) Sex:	489) DOB:	490) Sex:	491) DOB:	492) Sex:	493) DOB:	494) Sex:	
02	495) Driver's Name:	Initial:	Last Name:	496) DOB:	497) Sex:	498) DOB:	499) Sex:	500) DOB:	501) Sex:	502) DOB:	503) Sex:	504) DOB:	505) Sex:	506) DOB:	507) Sex:	508) DOB:	509) Sex:	
02	510) Driver's Name:	Initial:	Last Name:	511) DOB:	512) Sex:	513) DOB:	514) Sex:	515) DOB:	516) Sex:	517) DOB:	518) Sex:	519) DOB:	520) Sex:	521) DOB:	522) Sex:	523) DOB:	524) Sex:	
02	525) Driver's Name:	Initial:	Last Name:	526) DOB:	527) Sex:	528) DOB:	529) Sex:	530) DOB:	531) Sex:	532) DOB:	533) Sex:	534) DOB:	535) Sex:	536) DOB:	537) Sex:	538) DOB:	539) Sex:	
02	540) Driver's Name:	Initial:	Last Name:	541) DOB:	542) Sex:	543) DOB:	544) Sex:	545) DOB:	546) Sex:	547) DOB:	548) Sex:	549) DOB:	550) Sex:	551) DOB:	552) Sex:	553) DOB:	554) Sex:	
02	555) Driver's Name:	Initial:	Last Name:	556) DOB:	557) Sex:	558) DOB:	559) Sex:	560) DOB:	561) Sex:	562) DOB:	563) Sex:	564) DOB:	565) Sex:	566) DOB:	567) Sex:	568) DOB:	569) Sex:	
02	570) Driver's Name:	Initial:	Last Name:	571) DOB:	572) Sex:	573) DOB:	574) Sex:	575) DOB:	576) Sex:	577) DOB:	578) Sex:	579) DOB:	580) Sex:	581) DOB:	582) Sex:	583) DOB:	584) Sex:	
02	585) Driver's Name:	Initial:	Last Name:	586) DOB:	587) Sex:	588) DOB:	589) Sex:	590) DOB:	591) Sex:	592) DOB:	593) Sex:	594) DOB:	595) Sex:	596) DOB:	597) Sex:	598) DOB:	599) Sex:	
02	600) Driver's Name:	Initial:	Last Name:	601) DOB:	602) Sex:	603) DOB:	604) Sex:	605) DOB:	606) Sex:	607) DOB:	608) Sex:	609) DOB:	610) Sex:	611) DOB:	612) Sex:	613) DOB:	614) Sex:	
02	615) Driver's Name:	Initial:	Last Name:	616) DOB:	617) Sex:	618) DOB:	619) Sex:	620) DOB:	621) Sex:	622) DOB:	623) Sex:	624) DOB:	625) Sex:	626) DOB:	627) Sex:	628) DOB:	629) Sex:	
02	630) Driver's Name:	Initial:	Last Name:	631) DOB:	632) Sex:	633) DOB:	634) Sex:	635) DOB:	636) Sex:	637) DOB:	638) Sex:	639) DOB:	640) Sex:	641) DOB:	642) Sex:	643) DOB:	644) Sex:	
02	645) Driver's Name:	Initial:	Last Name:	646) DOB:	647) Sex:	648) DOB:	649) Sex:	650) DOB:	651) Sex:	652) DOB:	653) Sex:	654) DOB:	655) Sex:	656) DOB:	657) Sex:	658) DOB:	659) Sex:	
02	660) Driver's Name:	Initial:	Last Name:	661) DOB:	662) Sex:	663) DOB:	664) Sex:	665) DOB:	666) Sex:	667) DOB:	668) Sex:	669) DOB:	670) Sex:	671) DOB:	672) Sex:	673) DOB:	674) Sex:	
02	675) Driver's Name:	Initial:	Last Name:	676) DOB:	677) Sex:	678) DOB:	679) Sex:	680) DOB:	681) Sex:	682) DOB:	683) Sex:	684) DOB:	685) Sex:	686) DOB:	687) Sex:	688) DOB:	689) Sex:	
02	690) Driver's Name:	Initial:	Last Name:	691) DOB:	692) Sex:	693) DOB:	694) Sex:	695) DOB:	696) Sex:	697) DOB:	698) Sex:	699) DOB:	700) Sex:	701) DOB:	702) Sex:	703) DOB:	704) Sex:	
02	705) Driver's Name:	Initial:	Last Name:	706) DOB:	707) Sex:	708) DOB:	709) Sex:	710) DOB:	711) Sex:	712) DOB:	713) Sex:	714) DOB:	715) Sex:	716) DOB:	717) Sex:	718) DOB:	719) Sex:	
02	720) Driver's Name:	Initial:	Last Name:	721) DOB:	722) Sex:	723) DOB:	724) Sex:	725) DOB:	726) Sex:	727) DOB:	728) Sex:	729) DOB:	730) Sex:	731) DOB:	732) Sex:	733) DOB:	734) Sex:	
02	735) Driver's Name:	Initial:	Last Name:	736) DOB:	737) Sex:	738) DOB:	739) Sex:	740) DOB:	741) Sex:	742) DOB:	743) Sex:	744) DOB:	745) Sex:	746) DOB:	747) Sex:	748) DOB:	749) Sex:	
02	750) Driver's Name:	Initial:	Last Name:	751) DOB:	752) Sex:	753) DOB:	754) Sex:	755) DOB:	756) Sex:	757) DOB:	758) Sex:	759) DOB:	760) Sex:	761) DOB:	762) Sex:	763) DOB:	764) Sex:	
02	765) Driver's Name:	Initial:	Last Name:	766) DOB:	767) Sex:	768) DOB:	769) Sex:	770) DOB:	771) Sex:	772) DOB:	773) Sex:	774) DOB:	775) Sex:	776) DOB:	777) Sex:	778) DOB:	779) Sex:	
02	780) Driver's Name:	Initial:	Last Name:	781) DOB:	782) Sex:	783) DOB:	784) Sex:	785) DOB:	786) Sex:	787) DOB:	788) Sex:	789) DOB:	790) Sex:	791) DOB:	792) Sex:	793) DOB:	794) Sex:	
02	795) Driver's Name:	Initial:	Last Name:	796) DOB:	797) Sex:	798) DOB:	799) Sex:	800) DOB:	801) Sex:	802) DOB:	803) Sex:	804) DOB:	805) Sex:	806) DOB:	807) Sex:	808) DOB:	809) Sex:	
02	81																	

EXHIBIT “E”

Law Offices of Sander Budanitsky, L.L.C.

520 West First Avenue
Roselle, New Jersey 07203
Tel: (908) 241-3445
Fax: (908) 241-4595
e-mail: budanitskylaw@gmail.com

* Also admitted in Pennsylvania

Sander Budanitsky *
Kimberly A. Rudolph *
Of Counsel

January 30, 2012

MAXUM Specialty Insurance Group
3655 North Point Parkway, Suite 500
Alpharetta, Georgia 30005
Attention: Richard V. Sforzo
Claims Representative

RE: Your Insured: Sharp Trucking Inc
Claim #: T6297-43
Date of Accident: 01/13/11
My Client: Igor Volkov

Dear Mr. Sforzo:

As you are aware, this office represents Mr. Volkov, in connection with his claim for personal injuries sustained on January 13, 2011 while involved in a motor vehicle accident. Enclosed please find a copy of the Declaration Page, Police Report and Property Damage Estimate for your records. Please be advised that a claim for Property Damage in the amount of \$4,098.37 is made herein.

Further, enclosed please find a copy of the final Narrative report/bill, medical evaluation, EMG report from Manalapan Medical Center and MRI reports from DRA of Edison.

Also, please be advised plaintiff has incurred bills which total \$59,816.67 to date. The bills are as follows:

Raritan Bay Medical Center.....	\$2,680.00
Bayview Emergency Associates.....	\$ 386.00
DRA of Edison.....	\$2,964.00
Manalapan Medical Center.....	\$20,575.01

Please be advised that these bills remain outstanding.

In accordance with Diagnostic Testing and doctors' reports, my client sustained as a direct result of the accident on August 26, 2010, the following injuries: Disc herniation at L3-L4, L5-S1 with grade I anterolisthesis, bilateral L4, L5 and S1 radiculopathy; disc herniation at C4-C5, C5-C6, C6-C7 and bilateral C5,C6 and C7 radiculopathy. These injuries are permanent in nature.

Based upon the foregoing and based upon absolute liability on the part of your insured, demand is hereby made solely on an amicable out-of-court settlement in the amount of \$175,000.00. After you have an opportunity to review the enclosed medicals, kindly contact me, so we may discuss same. Thank you for your anticipated courtesy and cooperation.

Very truly yours,

SANDER BUDANITSKY

SB:luz